

REMARKS

Claims 1-45 are pending. Claim 21 has been amended. Support for this amendment can be found generally in *e.g.* Figures 4, 8a, 8b, and 9-11. In view of the following remarks, Applicants respectfully request reexamination and allowance of claims 1-45.

Claims 1-45 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Lo et al. (US 5,911,044, hereinafter "Lo") in view of Bajaj et al. (US 6,438,266, hereinafter "Bajaj"). Applicants note that the text of the Examiner's rejection cites Lo in view of Guenter (US 6,072,496). However, the reference to Guenter appears to be a typographical error. The patent number cited for Guenter is actually the patent number for Lo. Furthermore, the Examiner's discussions of the cited references refer to Lo and Bajaj. Therefore, Applicants assume that the rejection contains a typographical error and the intent was to reject claims 1-45 over Lo in view of Bajaj. This rejection is respectfully traversed.

Independent claim 1 recites, in part, a method for providing electronic delivery of electronic model images. The method includes generating, storing, and delivering electronic model images to a remote client computer. The images are stored within computer readable memory of a server-based computing system. The method further includes manipulating the electronic model images and performing analysis and a course of action using the manipulated electronic model images. The electronic model images recited in claim 1 include, in part, a polygonal mesh representation of the physical object.

Lo discloses a method for running a scanner over a network from a client computer. Lo further discloses storing the electronic images on a storage device on the client computer. *See e.g.* column 8, lines 3-20, column 21, lines 41-56, and Figure 3. In Lo, only the scanner parameters and not the electronic images themselves are stored on the server. *See e.g.* column 15, line 65 and Figure 8C. Lo further fails to disclose or suggest manipulating an image after scanning in the physical object. Rather, Lo is directed towards merely changing a few scanning parameters such as resolution, brightness, and contrast and then scanning a document. *See e.g.* column 15, lines 40-55. Moreover, even if changing the scanning parameters can be seen as similar to manipulating the images, a point Applicants do not concede, Lo does not recite scanning the document until after manipulating such parameters. *See e.g. id.* and Figure 8E.

Furthermore, Lo fails to disclose or suggest performing analysis and a course of action using the manipulated electronic model images. Rather, Lo is directed towards simply obtaining a copy of the scanned document on the client computer. Lo is not concerned with what is done to the scanned image after it has been transmitted. *See e.g.* Abstract and Figure 8E, 14C, and 14D. Bajaj does not overcome the shortcomings of Lo. Rather, Bajaj is directed at encoding three-dimensional objects, transmitting the encoded data, and then decoding the data to reform the original image. See e.g. column 3, lines 53-60 and Figures 29, 30, and 37. Therefore, for at least these reasons, Lo would not lead a person having skill in the art to the method of claim 1, even in view of Bajaj.

Claims 2-8 depend from claim 1 and are allowable for at least the same reasons. Applicants do not otherwise concede the correctness of the rejection to these claims, and reserve the right to make additional arguments as may be necessary.

Independent claim 9 recites, in part, a method for providing electronic delivery of electronic model images. The method includes manipulating the electronic model images upon the remote client computer. Manipulating the electronic model images includes moving one or more portions of the electronic model image relative to other portions of the electronic model image on the visual display device to review and/or determine the interaction of the corresponding portions of the physical object.

As noted above with respect to claim 1, Lo fails to disclose or suggest manipulating the electronic images. Lo fails to disclose or suggest moving one or more portions of the electronic images relative to other portions on a visual display device. Rather, Lo is directed towards obtaining an accurate copy of a scanned document on a client computer. Lo further fails to disclose or suggest moving the electronic images for the purpose of determining the interaction of corresponding portions of the physical object. The electronic images in Lo represent static or fixed two-dimensional documents. Portions of two-dimensional documents do not interact with other portions through movement. Moreover, Bajaj does not overcome the shortcomings of Lo. Therefore, Lo would not lead a person having skill in the art to the method of claim 9, even in view of Bajaj.

Claim 10 is allowable for at least the same reasons. Applicants do not otherwise concede the correctness of the rejection to these claims, and reserve the right to make additional arguments as may be necessary.

Independent claim 11 recites, in part, a method for providing electronic model image data files to a remote client computer. The method includes receiving an electronic model image data file and storing it within the server-based computing system. The method further includes receiving a search query from the remote client computer to identify one or more electronic model image data files.

As noted above with respect to claim 1, Lo fails to disclose or suggest storing an electronic image within the server-based computing system and instead recites storing the image directly on the client computer. Lo further fails to disclose or suggest receiving a search query from the client computer after generation of the image. In Lo, the scanned images are stored on the client computer, not the server. Therefore, the client would not search the scanner server for an image. Moreover, the section of Lo cited by the Examiner is directed at a scan-to-file option in which the scanner server and not the client computer initiates the transfer of the images. Bajaj does not overcome the shortcomings of Lo. Therefore, Lo would not lead a person having skill in the art to the method of claim 11, even in view of Bajaj.

Claims 12-15 are allowable for at least the same reasons. Applicants do not otherwise concede the correctness of the rejection to these claims, and reserve the right to make additional arguments as may be necessary.

The Examiner did not specify the rejection of claims 16-45. Therefore, Applicants have provided a general discussion of these claims below. In the event that the Examiner maintains the rejection, it is requested that the Examiner specify the portions of the reference(s) on which the rejection is based.

Independent claim 16 recites, in part, a computer program data product readable by a computing system and encoding instructions implementing a method for providing electronic model image data files to a remote client computer. The method includes storing the electronic model image data files within the server-based computing system and receiving a search query from the remote client computer to identify one or more electronic model image data files. As discussed above with respect to claim 11, Lo fails to disclose or suggest transmitting a search query from the remote client computer. Furthermore, Bajaj does not overcome the shortcomings of Lo. Therefore, claim 16 is allowable for at least the reasons discussed with respect to claim 11.

Claims 17-20 are allowable for at least the same reasons. Applicants do not otherwise concede the correctness of the rejection to these claims, and reserve the right to make additional arguments as may be necessary.

Independent claim 21 recites, in part, a server based computing system for providing electronic model image data files to a remote client computer over a distributed communications network. The electronic model image data files include a file header info data block containing data used to identify a three dimensional physical object represented by the electronic model image data file and an electronic model image, a portion of the electronic model image containing a polygonal mesh representation of the three dimensional physical object generated from scanned electronic data of a three dimensional physical object.

Lo fails to disclose or suggest electronic model images representing three dimensional physical objects. Lo further fails to disclose or suggest that a portion of the electronic images contain a polygonal mesh representation generated from scanned electronic data of the three dimensional physical objects. Rather, Lo is directed at copying a fixed or static two-dimensional document of two-dimensional photograph from an image capture device and displaying it on a computer remote from the image capture device. *See e.g.* column 7, lines 60-67 and Abstract.

Furthermore, the data disclosed in Bajaj would not work with the system disclosed in Lo. Bajaj is directed at a scheme for encoding, transmitting, and decoding polygonal mesh representations of three-dimensional objects. Bajaj discloses that transmitting digital representations of 3-D objects can be tricky and often requires complex encoding and decoding of the image data files before and after transmission. Such data files would not be able to be transmitted according to the method disclosed in Lo. Consequently, the references of Bajaj and Lo cannot be combined to yield computing system for providing electronic model image data files representing three dimensional physical objects to a remote client computer. Therefore, Lo would not lead a person having skill in the art to the computing system of claim 21, even in view of Bajaj.

Claims 22-25 are allowable for at least the same reasons. Applicants do not otherwise concede the correctness of the rejection to these claims, and reserve the right to make additional arguments as may be necessary.

Independent claim 26 recites, in part, a method for receiving electronic model image data files by a remote client computer from a server-based computing system over a distributed

communications network. The method includes transmitting a search query from the remote client computer to the server-based computing system to identify one or more electronic model image data files stored within the server-based computing system. The method further includes manipulating the electronic model images upon the remote client computer.

As discussed above with respect to claim 11, Lo fails to disclose or suggest transmitting a search query from the remote client computer. Furthermore, as discussed above with respect to claims 1 and 9, Lo further fails to disclose or suggest manipulating the electronic model images upon the remote client computer. Moreover, Bajaj does not overcome the shortcomings of Lo. Therefore, claim 26 is allowable for at least the reasons discussed with respect to claim 1, 9, and 11.

Claims 27-33 are allowable for at least the same reasons. Applicants do not otherwise concede the correctness of the rejection to these claims, and reserve the right to make additional arguments as may be necessary.

Independent claim 34 recites, in part, a method for receiving electronic model image data files by a remote client computer from a server-based computing system over a distributed communications network. The method includes manipulating the electronic model images upon the remote client computer. Manipulating the images includes moving one or more portions of the electronic model image relative to other portions of the electronic model image on the visual display device to determine the interaction of the corresponding portions of the physical object. As discussed above with respect to claim 1, Lo fails to disclose or suggest manipulating the electronic images. Furthermore, as discussed above with respect to claim 9, Lo fails to disclose or suggest moving the electronic image relative to other portions of the electronic image. Bajaj does not overcome the shortcomings of Lo. Therefore, claim 34 is allowable for at least the reasons discussed with respect to claim 1 and 9.

Claim 35 is allowable for at least the same reasons. Applicants do not otherwise concede the correctness of the rejection to these claims, and reserve the right to make additional arguments as may be necessary.

Independent claim 36 recites, in part, a computer program data product readable by a computing system and encoding instructions implementing a method for receiving electronic model image data files by a remote client computer from a server-based computing system over a distributed communications network. The method includes transmitting a search query from

the remote client computer to the server-based computing system to identify one or more electronic model image data files stored within the server-based computing system. The method further includes manipulating the electronic model images upon the remote client computer. As discussed above with respect to claim 11, Lo fails to disclose or suggest transmitting a search query from the remote client computer to the server-based computing system. Furthermore, as discussed above with respect to claims 1 and 9, Lo further fails to disclose or suggest manipulating the electronic model images upon the remote client computer. Bajaj does not fix the shortcomings of Lo. Therefore, claim 36 is allowable for at least the reasons discussed with respect to claim 1, 9, and 11.

Claims 37-43 are allowable for at least the same reasons. Applicants do not otherwise concede the correctness of the rejection to these claims, and reserve the right to make additional arguments as may be necessary.

Independent claim 44 recites, in part, a computer program data product readable by a computing system and encoding instructions implementing a method for receiving electronic model image data files by a remote client computer from a server-based computing system over a distributed communications network. The method includes manipulating the electronic model images upon the remote client computer. Manipulating the electronic model images includes moving one or more portions of the electronic model image relative to other portions of the electronic model image on the visual display device to determine the interaction of the corresponding portions of the physical object. As discussed above with respect to claim 9, Lo fails to disclose or suggest manipulating the electronic model images upon the remote client computer. Furthermore, Bajaj does not fix the shortcomings of Lo. Therefore, claim 44 is allowable for at least the same reasons as discussed with respect to claim 9.

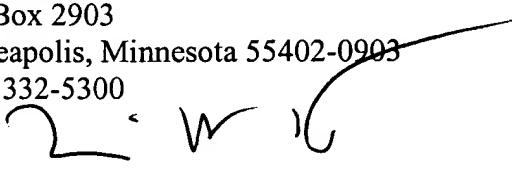
Claim 45 is allowable for at least the same reasons. Applicants do not otherwise concede the correctness of the rejection to these claims, and reserve the right to make additional arguments as may be necessary.

In view of the above amendments and remarks, Applicant respectfully requests a Notice of Allowance. If the Examiner believes a telephone conference would advance the prosecution of this application, the Examiner is invited to telephone the undersigned at the below-listed telephone number.

Respectfully submitted,

MERCHANT & GOULD P.C.
P.O. Box 2903
Minneapolis, Minnesota 55402-0903
(612) 332-5300

Date: March 15, 2005



Brian H. Batzli
Reg. No. 32,960

BHB/JKS/jt